

IN THE UNITED STATE DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

EZEKIEL DAVIS,
PLAINTIFF,
v
CORE CIVIC, INC.,
et al.,
DEFENDANTS.

CASE NO. CIV-17-293-RAW-
FILED SPS

JUN 10 2020

PATRICK KEANEY
Clerk, U.S. District Court

Deputy Clerk

PLAINTIFF'S WITNESS AND EXHIBITS
LIST

COMES NOW EZEKIEL DAVIS, Plaintiff appearing pro se in the above entitled case moves with this motion.

Plaintiff witness list is as follows;

- 1.) JAMES YATES, will testify to the duties and responsibility as DCF/CORE CIVIC WARDEN, and testify to the existence of the memorandum mentioned in his affidavit, and whether he knows what a "Memorandum" looks like, who was present.
- 2.) M. Gentry, Asst. Warden, will testify to the duties and responsibilities of his position and his interaction with Plaintiff.
- 3.) Chief J. DORMAN, will testify to her duties and responsibility of her position and her involvement with the Law Library. Whether she participate in creating the memorandum James Yate affidavit mentions. Who all was present when the memorandum was created.

- 4.) Willa Burney, Law Library Supervisor, will testify concerning her duties and responsibilities, her involvement with creating a Memorandum with ODOC General Counsel and Core Clinic headquarters, and what differences were made to policies OP-090124 and OP-030115, who was present when the memorandum was created.
- 5.) Ms. Hamilton, Mental Health, will testify concerning her duties and responsibilities, and her interactions with Plaintiff on June 5 and 6, 2017.
- 6.) Tiffany Acle, Maximum Unit, Unit Manager, will testify concerning her duties and responsibilities, and her placing Plaintiff in cell where I would not be bottom bunk per - medical approved bottom bunk restriction, and why she placed me in the cell with young gang members and would tell inmates that I am a rat.
- 7.) Mrs. Brill, Nurse, will testify that she was present when Frederick Gray was removed from EB-106 on the morning of June 12, 2017 at 1:35 A.M. and C.O. Romine was present.
- 8.) C.O. Romine, will testify that he was present with Mrs. Brill when Frederick Gray tried to attack me with a food tray and was removed by a Captain.
- 9.) Joe Allbaugh, Director ODOC, will testify concerning his duties and responsibilities, his signing a Memorandum that allow private prison Davis Correctional Facility (DCF) to implement two (2) major policies that "differ slightly" a DCF than at a ODOC facility, and whether he knows what a Memorandum looks like in form.

- 10.) David Cincotta, Director ODOC General Counsel, will testify to the duties and responsibility involved in his position, he will testify to the creation of the Memorandum mentioned in James Yates Affidavit, who ~~was~~ present when the Memorandum was created.
- 11.) Mark Knutson, Director Designee, will testify to the duties and responsibilities of his office, and about the Memorandum mention in James Yates Affidavit.
- 12.) Ms. Sam Sam Hassan, Law Library Supervisor, will testify to the duties and responsibilities of her office, how long she was trained before being placed in her position.
- 13.) Frederick Sanders, Doctor, will testify to the duties and responsibilities as medical doctor, whether he ever physically treated Plaintiff, how he know Plaintiff helped other prisoners with their legal work, why he called Plaintiff a scammer in a medical chart entries, on what medical grounds was referral for MRI ordered.
- 14.) Ray Larimer, Medical Administrator, will testify concerning what medical care was delayed and why Dr. Sander never provided medical care to Plaintiff.
- 15.) Serena Brewer, Nurse Practitioner, will testify concerning her duties and responsibilities, whether she ever recommended Dr. Sanders treat Plaintiff, whether she was told not to make entries concerning Plaintiff spinal condition, whether she is train to diagnose what Plaintiff spinal condition is.

- 16) Keith Evans, DCF Chief Medical Officer will testify concerning his duties and responsibilities, on what grounds did he approve the referral by Dr. Frederick Sanders for MRI only on cervical, and not Plaintiff's entire back, will explain in detail the medical reason(s) for doing so when Dr. Sanders never physically examined Plaintiff himself.
- 17) Sue Burlchatter, Nurse Practitioner, will testify concerning her duties and responsibilities, whom her employer is, where she is employed at, the state of her employment - location, and what medical treatment/care could she provide to Plaintiff.
- 18) Darrell L. Moore and Julia Neftzger will testify concerning whom is their employer, their duties and responsibilities, whether they were one or both present when Core Civic head quarter created the memorandum with Oklahoma DOC General Counsel and DCF Law Library.

Plaintiff's Exhibit List

Plaintiff's Exhibits List will consist of all Exhibits attached to the Complaint, Exhibits submitted with the TRO's and any and all Exhibits/documents sought and/or presented during discovery of relevant to this claims and defense in this case. Plaintiff is unable to itemize the list because I don't have my property. Relevant ODOC Policies

Respectfully submitted
Ethan Evans

CERTIFICATE OF SERVICE

I hereby certify that on 6-8-20 I served a true and correct copy of the foregoing "Plaintiff's Witness and Exhibits List", postage per paid, mailed to:

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(did not send E.H. Darg)

Ezekiel Davis